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10 **UNITED STATES BANKRUPTCY COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA–SANTA ANA DIVISION**

12 In re

13 2ND CHANCE INVESTMENT
14 GROUP, LLC,

15 Debtor.

16 } CASE NO.: 8:22-bk-12142-SC

17 } STATUS REPORT AND STATEMENT
18 } OF NO OPPOSITION FILED TO THE
19 } MOTION FOR APPROVAL OF TWO
20 } STIPULATIONS FOR RELIEF FROM
21 } THE AUTOMATIC STAY UNDER 11
22 } U.S.C. §§ 362(d)(1) AND 362(d)(2)
23 } FOR:

24 } 1. (ECF #365) 1611 A & B 151ST
25 } AVENUE, SAN LEANDRO, CA 94578,
26 } APN NO. 080-0022-032-00; and

27 } 2. (ECF #366) 1004 PEACHWOOD
28 } COURT LOS BANOS, CA 93635, APN
29 } No. 082-282-031

30 } Date: March 13, 2024
31 } Time: 1:30 P.M.
32 } Judge: Hon. Scott C. Clarkson

33 } United States Bankruptcy Court
34 } 411 West Fourth Street
35 } Suite 5130 / Courtroom 5C
36 } Santa Ana, CA 92701-4593
37 } (Via Zoom.gov)

1 **TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES
2 BANKRUPTCY COURT JUDGE, THE DEBTOR, DEBTOR'S COUNSEL, AND
3 OTHER INTERESTED PARTIES:**

4 On February 2, 2024, as ECF 368, Creditors Lantzman Investments, Inc. and
5 LMF2, LLC. (collectively “Creditors”), by and through their counsel, filed their
6 Motion (“Motion”) to Approve two Stipulations with the Debtor for relief from the
7 automatic stay under 11 U.S.C. §§ 362(d)(1) and 362(d)(2) for: (1) (ECF #365) 1611
8 A & B 151ST AVENUE, SAN LEANDRO, CA 94578, APN NO. 080-0022-032-00
9 and (2) (ECF #366) 1004 PEACHWOOD COURT LOS BANOS, CA 93635, APN No.
10 082-282-031. On February 2, 2024, the Motion was noticed for hearing (ECF #370) on
11 March 13, 2024 at 1:30 p.m., and was served on all creditors and parties in interest. This
12 Court set the Motion for hearing on that date and at that time. ECF #380.

13 The last date for anyone to oppose the relief requested was February 28, 2024. A
14 review of the docket in this case reveals that no one has filed any opposition to the
15 Motion. As a result, Creditors respectfully request that this Court grant the Motion as
16 prayed and permit it to upload orders granting the Motion and approving the two
17 Stipulations (ECF #s 365 and 366).

18
19 Respectfully submitted,

20 Dated: March 1, 2024

21 FENNEMORE LLP

22
23 By: /s/ Kathleen A. Cashman-Kramer

24 Gary B. Rudolph
25 Kathleen A. Cashman-Kramer
26 Attorneys for Secured Creditors
27 Lantzman Investments, Inc. and LMF2 LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 600 B Street, Suite 1700 San Diego, CA 92101

A true and correct copy of the foregoing document entitled (*specify*):

STATUS REPORT AND STATEMENT OF NO OPPOSITION FILED TO THE MOTION FOR APPROVAL OF STIPULATION FOR RELIEF FROM STAY (ECF #234)37915 MARSALA DR., PALMDALE, CA 93552, APN NO. 3023-073-011; FOR APPROVAL OF STIPULATION FOR RELIEF FROM STAY (ECF #233) 730 & 732 East 78th STREET LOS ANGELES, CA APN NO. 6023-031-025; and FOR APPROVAL OF STIPULATION FOR RELIEF FROM STAY (ECF#232) 43933 30th STREET EAST, LANCASTER, CA 93535 APN NO. 3150-050-021; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to
9 controlling General Orders and LBR, the foregoing document will be served by the court via NEF and
hyperlink to the document. On (date)
03/01/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and
determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission
at the email addresses stated below:

- Amanda G. Billyard abilityard@bwlawcenter.com
- Stephan M Brown ECF@thebklawoffice.com,
stephan@thebklawoffice.com; roslyn@thebklawoffice.com
- Kathleen A Cashman-Kramer cashman-kramer@sullivanhill.com,
theresam@psdslaw.com
- Dane W Exnowski dane.exnowski@mccalla.com,
bk.ca@mccalla.com; mccallaecf@ecf.courtdrive.com
- Lazaro E Fernandez lef17@pacbell.net, lef-sam@pacbell.net; lef-mari@pacbell.net; OfficeLR74738@notify.bestcase.com; lefkarina@gmail.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goforecf@gmail.com
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kadele@wglp.com; [lbracken@wglp.com](mailto;lbracken@wglp.com); wglp@ecf.courtdrive.com; gestrada@wglp.com
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bkstaff@sullivanhill.com; vidovich@ecf.inforuptcy.com; rudolph@ecf.courtdrive.com; james@ecf.courtdrive.com
- Cheryl A Skigin caskigin@earthlink.net, caskigin@earthlink.net
- Richard L. Sturdevant rich@bwlawcenter.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- Christopher P. Walker cwalker@cpwalkerlaw.com,
Ihines@cpwalkerlaw.com; r57253@notify.bestcase.com
- Fanny Zhang Wan fwan@raslg.com
- Andy C Warshaw awarshaw@bwlawcenter.com,
warshaw.andyb110606@notify.bestcase.com
- Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

1 **2. SERVED BY UNITED STATES MAIL:**

2 On (date) 03/01/2024, I served the following persons and/or entities at the last known addresses in this
3 bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope
4 in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here
5 constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the
6 document is filed.

7 **Judge – Courtesy Copy**

8 Honorable Scott C. Clarkson
9 United States Bankruptcy Court
10 Central District of California
11 Ronald Reagan Federal Building and Courthouse
12 411 West Fourth Street, Suite 5130 / Courtroom 5C
13 Santa Ana, CA 92701-4593

14 **Residents of Real Property**

15 Shawn Southern
16 1611 151st Avenue
17 San Leandro CA 94578

18 Rosendo Quiroz Estroga
19 1004 Peachwood Court
20 Los Banos, CA 93635

21 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**
22 (state method

23 for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date)

24 , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those
25 who consented in writing to such service method), by facsimile transmission and/or email as follows.
26 Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will
27 be completed no later than 24 hours after the document is filed.



29 Service information continued
30 on attached page

31 I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.
32 03/01/2024 Laurel Dinkins

33 Date

34 Printed Name

35 /s/ Laurel Dinkins

36 Signature

37 This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

38 June 2012

39 **F 9013-3.1.PROOF.SERVICE**